

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

JEFFREY GORDON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CARE CAPITAL PROPERTIES, INC.,
DOUGLAS CROCKER II, RONALD G.
GEARY, JOHN S. GATES, JR., JOHN L.
WORKMAN, DALE ANNE REISS,
JEFFREY A. MALEHORN, and RAYMOND
J. LEWIS,

Defendants.

Case No. 1:17-cv-00859-LPS

CLASS ACTION

ROGER LOEB, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CARE CAPITAL PROPERTIES, INC.,
DOUGLAS CROCKER II, JOHN S. GATES,
JR., RONALD G. GEARY, RAYMOND J.
LEWIS, JEFFREY A. MALEHORN, DALE
A. REISS, JOHN L. WORKMAN, SABRA
HEALTH CARE REIT, INC., PR SUB, LLC,
CARE CAPITAL PROPERTIES, LP, and
SABRA HEALTH CARE LIMITED
PARTNERSHIP,

Defendants.

Case No. 1:17-cv-00866-LPS

CLASS ACTION

[captions continue on subsequent pages]

COREY VINEYARD, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

CARE CAPITAL PROPERTIES, INC.,
DOUGLAS CROCKER II, RONALD G.
JURY DEMAND GEARY, JOHN S.
GATES, JR., JOHN L. WORKMAN,
DALE ANNE REISS, JEFFREY A.
MALEHORN, and RAYMOND J. LEWIS,

Defendants.

Case No. 1:17-cv-00878-LPS

CLASS ACTION

GLENN PARRISH, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

CARE CAPITAL PROPERTIES, INC.,
RAYMOND J. LEWIS, DOUGLAS
CROCKER II, JOHN S. GATES, JR.,
RONALD G. GEARY, JEFFREY A.
MALEHORN, DALE A. REISS, and JOHN
L. WORKMAN,

Defendants.

Case No. 1:17-cv-00909-LPS

CLASS ACTION

MELVYN KLEIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CARE CAPITAL PROPERTIES, INC.,
RAYMOND J. LEWIS, DOUGLAS
CROCKER II, JEFFREY A. MALEHORN,
JOHN L. WORKMAN, JOHN S. GATES,
JR., DALE A. REISS, RONALD G.
GEARY, CARE CAPITAL PROPERTIES,
LP, SABRA HEALTH CARE REIT, INC.,
PR SUB, LLC, and SABRA HEALTH
CARE LIMITED PARTNERSHIP,

Defendants.

Case No. 1:17-cv-00920-LPS

CLASS ACTION

**JOINT STIPULATION AND [PROPOSED] ORDER
CONSOLIDATING RELATED ACTIONS**

WHEREAS, five related shareholder class actions have been filed in the United States District Court for the District of Delaware relating to the proposed acquisition of Care Capital Properties, Inc. (“Care Capital”) by Sabra Health Care REIT, Inc. (the “Proposed Acquisition”): *Gordon v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00859-LPS (D. Del. June 29, 2017); *Loeb v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00866-LPS (D. Del. June 30, 2017); *Vineyard v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00878-LPS (D. Del. July 3, 2017); *Parrish v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00909-LPS (D. Del. July 6, 2017); and *Klein v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00920-LPS (D. Del. July 10, 2017).

IT IS HEREBY STIPULATED AND AGREED, by plaintiffs Jeffrey Gordon, Roger Loeb, Corey Vineyard, Glenn Parrish and Melvyn Klein (collectively, the “Plaintiffs”) and by defendants Care Capital, Douglas Crocker II, Ronald G. Geary, John S. Gates, Jr., John L. Workman, Dale

Anne Reiss, Jeffrey A. Malehorn, Raymond J. Lewis, and Care Capital Properties LP, (collectively, the “Care Capital Defendants”), through their respective undersigned counsel, as follows:

1. The following actions shall be consolidated for all purposes to form this consolidated action: *Gordon v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00859-LPS (D. Del. June 29, 2017); *Loeb v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00866-LPS (D. Del. June 30, 2017); *Vineyard v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00878-LPS (D. Del. July 3, 2017); *Parrish v. Care Capital Properties, Inc., et al.*, Case No. 1:17-cv-00909-LPS; and *Klein v. Care Capital Properties, Inc., et al.*, Case No 1:17-cv-00920-LPS (D. Del. July 10, 2017).

2. Every pleading filed in this consolidated action shall bear the following caption:

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

IN RE CARE CAPITAL PROPERTIES, INC.
SHAREHOLDER LITIGATION

This Document Relates To:
ALL ACTIONS

Civil Action No. 1:17-cv-00859-LPS

(CONSOLIDATED)

CLASS ACTION

3. Undersigned counsel for the Care Capital Defendants hereby acknowledges receipt of and accepts service of the complaints filed on June 29, 2017 in *Gordon v. Care Capital Properties, Inc., et al.*, No. 1:17-cv-00859-LPS (D. Del.), June 30, 2017 in *Loeb v. Care Capital Properties, Inc., et al.*, No. 1:17-cv-00866-LPS (D. Del.), July 3, 2017 in *Vineyard v. Care Capital Properties, Inc., et al.*, No. 1:17-cv-00878-LPS (D. Del.), July 6, 2017 in *Parrish v. Care Capital*

Properties, Inc., et al., No. 1:17-cv-00909-LPS (D. Del.) and July 10, 2017 in *Klein v. Care Capital Properties, Inc., et al.*, No 1:17-cv-00920-LPS on behalf of the Care Capital Defendants and waive their right to formal service of process pursuant to Fed. R. Civ. P. 4(d); and

4. This Order shall apply to each case, arising out of the same or substantially the same transactions or events as the Actions, which is subsequently filed in, removed to, or transferred to this Court.

Dated: July 25, 2017

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SO ORDERED THIS _____ day of _____, 2017

United States District Judge